## REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed April 18, 2006. Claims 1-34 were pending in the present application. This Amendment amends claims 1, 4, 5, 8, 11, 15, 17, 18, 22, 24, 25, and 28; and cancels claims 31-34; leaving pending in the application claims 1-30. Reconsideration of the rejected claims is respectfully requested.

### I. Rejection under 35 U.S.C. §103

Claims 1-8, 11-18, and 20-34 are rejected under 35 U.S.C. §103(a) as being obvious over *Havinis* (US 6,1-4,931) in view of *Melton* (US 5,255,306). Applicants respectfully submit that the claims as amended are not rendered obvious by these references, either alone or in combination.

The Examiner recognizes on page 2 of the office action that there are different types of monitoring, and invites Applicants to amend the claims such that the prior art does not read on the claimed embodiment. Applicants appreciate the Examiner's helpful suggestions, and have amended the claims to clarify that location information in the claimed embodiments is obtained for a wireless unit of interest when that unit is within any of multiple location zones covered by at least one of multiple wireless networks. This is very different from the monitoring of *Melton*, which only monitors whether an ID signal is received from within a specific boundary for a single local network, as discussed below. Accordingly, and as recognized by the Examiner, it is submitted that the claims as amended should be allowable over *Havinis* and *Melton*.

In particular, *Havinis* teaches defining location services whereby an entity such as an emergency center or law enforcement agency can override privacy settings of subscribers to obtain an instance of location information (col.3, lines 43-63; col. 4, lines 35-55). *Havinis* does not, however, disclose or suggest the monitoring of such a device over time, as recited in Applicants' claim 1. The office action of April 18 recognizes that *Havinis* is silent on "analyzing the location information to monitor a location of the wireless unit over time " (OA p. 4). *Havinis* does not teach monitoring or tracking, instead teaching obtaining an instance of positioning information in response to a specific request or triggering event. As such, *Havinis* cannot render

obvious Applicants' claim 1 or dependent claims 2-8 and 11. Independent claims 15 and 22, and claims that depend therefrom, recite limitations that similarly are not taught or suggested by *Havinis*.

*Melton* does not make up for these deficiencies in *Havinis* with respect to these claims. *Melton* discloses a house arrest system including an ankle or wrist bracelet and a field monitoring device for receiving a signal from the bracelet (col. 3, line 44-col. 4, line 4). A cellular interface connects the field monitoring device with a cellular network so that the house arrest system can operate independent of whether the house has an active telephone installed (col. 4, lines 5-25). The field monitoring device does not monitor position when the wireless unit of interest is within any of multiple location zones covered by at least one of multiple wireless networks, as recited in these claims, but instead makes only a binary (yes/no) determination as to whether or not the bracelet is within a specific range/boundary of the single field monitoring device of a single monitoring system. *Melton* teaches no ability to locate and/or monitor the device when outside that area/boundary. As such, *Melton* cannot render these claims obvious, either alone or in combination with *Havinis*. As such, claims 1, 15, and 22, dependent claims 2-8, 11-14, 16-18, 20-21, and 23-30 cannot be rendered obvious by *Havinis* and *Melton*, either alone or in combination.

Claims 9 and 19 are rejected under 35 U.S.C. §103(a) as being obvious over *Havinis* and *Melton*, and further in view of *Bar* (US 6,456,852). Claims 9 and 19 depend from claims 1 and 15, respectively, which are not rendered obvious by *Havinis* and *Melton* as discussed above. *Bar* does not make up for the deficiencies in *Havinis* and *Melton* with respect to claims 1 and 15.

*Bar* teaches a system for distributing real time information of cellular phone users to various third party information subscribers (col. 2, lines 9-23), and is cited as teaching "combining several different location determining methods to define the location of a user" (OA p. 6). Such teaching still would not make up for the deficiencies in *Havinis* and *Melton* with respect to claims 1 and 15, however, as *Bar* fails to teach or suggest "obtaining, from said system, location information for said wireless unit of interest when said wireless unit of interest is within any of multiple location zones covered by at least one of the multiple wireless

networks", and "analyzing the location information to monitor a location of the wireless unit over time". As such, *Bar* cannot render obvious claims 1 and 15, or dependent claims 9 and 19, alone or in any combination with *Havinis* and *Melton*.

Claim 10 is rejected under 35 U.S.C. §103(a) as being obvious over *Havinis* and *Melton*, and further in view of *Havinis #2* (US 6,360,102). Claims 10 depends from claim 1, which is not rendered obvious by *Havinis* and *Melton* as discussed above. *Havinis #2* does not make up for the deficiencies in *Havinis* and *Melton* with respect to claim 1.

*Havinis #2* teaches a telecommunications system allowing each mobile subscriber to define a profile containing a list of preferred subscribers that have permission to position the mobile subscriber (col. 4, lines 5-27). *Havinis #2* is cited as teaching the requiring of a court order to allow a law enforcement agent to determine the position of a person (OA p. 10). Such teaching still would not make up for the deficiencies in *Havinis* and *Melton* with respect to claim 1, however, as *Havinis #2* fails to teach or suggest "obtaining, from said system, location information for said wireless unit of interest when said wireless unit of interest is within any of multiple location zones covered by at least one of the multiple wireless networks", and "analyzing the location information to monitor a location of the wireless unit over time". As such, *Havinis #2* cannot render obvious claim 1, or dependent claim 10, alone or in any combination with *Havinis* and *Melton*.

Applicants therefore respectfully request that the rejections with respect to claims 1-30 be withdrawn.

## II. Amendment to the Claims

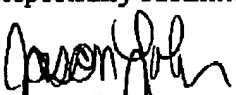
Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

## CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,



Jason D. Lohr
Reg. No. 48,163

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 415-576-0200
Fax: 415-576-0300
JDL:jdl
60795485 v1